

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA, *ex rel.*
ANTONI MUHAWI,

Plaintiff,

v.

PANGEA EQUITY PARTNERS, *et al.*,

Defendants.

Case No. 18-cv-02022

Hon. Manish S. Shah

Magistrate Judge Mary M. Rowland

DECLARATION OF PATRICK BORCHARD

I, Patrick Borchard, hereby declare as follows:

1. I am competent to give this Declaration, which is based upon my personal knowledge of the facts stated herein.

2. I am the Chief Financial Officer at Pangea Properties, a privately-held real estate investment trust based in Chicago that owns and operates over 10,000 apartments in Chicago, Indianapolis and Baltimore. I have held this position since 2011.

3. In April 2015, Pangea received a request from Cheryl Burns at the Chicago Housing Authority ("CHA") for copies of the rent rolls for all of its buildings that had residents whose rent was paid pursuant to the Section 8 Housing Choice Voucher Program.

4. David Jaffee, who was then a Pangea employee, was the point person responsible for responding to this request.

5. I was aware of the request and the ensuing communications between Pangea and CHA with respect to this request, which continued over several months.

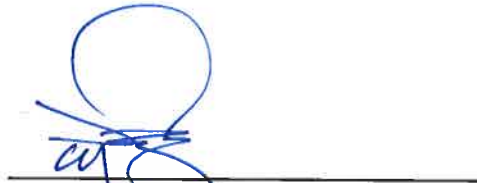
6. On June 23, 2015, Mr. Jaffee transmitted to Ms. Burns a rent roll in Excel format. Ms. Burns requested additional information relating to that rent roll and, on August 3, 2015, Mr. Jaffee transmitted to her a rent roll in Excel format, entitled "Pangea Rent Roll 8-3."

7. Thereafter, Pangea did not receive any requests for additional information from CHA regarding its original rent roll request made in April 2015. Pangea heard nothing more from CHA about the issue.

8. Since these events in 2015, CHA has continued to make housing assistance payments to Pangea pursuant to the Section 8 Housing Choice Voucher Program.

Pursuant to the requirements of 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 11, 2022.



Patrick Borchard